

1 **Stephen Chapman**  
2 7917 Selma Ave #336  
3 Los Angeles, CA 90046  
4 (619) 550-7543  
5 [StefinChapman@outlook.com](mailto:StefinChapman@outlook.com)  
6 **Plaintiff, In Pro Per**

<b>FILED</b>
CLERK, U.S. DISTRICT COURT
<b>1/30/25</b>
CENTRAL DISTRICT OF CALIFORNIA
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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

STEPHEN CHAPMAN,  
Plaintiff,

Case No. 2:24-CV-10546-MWF-BFM  
District Judge: Michael W. Fitzgerald:

v .

**SUPPLEMENTARY DECLARATION  
OF PLAINTIFF STEPHEN CHAPMAN  
IN OPPOSITION TO RULE 26(F)  
PROCEEDINGS & IN SUPPORT OF  
NOTICE OF LACK OF SUBJECT-  
MATTER JURISDICTION, MOTION  
TO STRIKE, AND MOTION FOR  
SANCTIONS**

HORACE MANN PROPERTY &  
CASUALTY INSURANCE  
COMPANY et al

**Amended Pleading Filed(State):**01/03/2025  
**Motion Filed (State):** 01/06/2025  
**Matter Stayed (State):** 01/07/2025  
**Invalid Notice Filed (State):** 01/07/2025  
**State Motion Hearing:** 03/13/2025

Defendant(s)

**Dated: 01/29/2025**

**DECLARATION OF STEPHEN CHAPMAN**

**I, Stephen Chapman, declare as follows:**

SUPPLEMENTARY DECLARATION OF PLAINTIFF STEPHEN CHAPMAN IN OPPOSITION TO RULE  
26(F) PROCEEDINGS & IN SUPPORT OF NOTICE OF LACK OF SUBJECT-MATTER JURISDICTION,  
MOTION TO STRIKE, AND MOTION FOR SANCTIONS

1 1. I am the Plaintiff in this matter, appearing **pro se**, and I submit this  
2 declaration in **opposition to Defendant's improper enforcement of**  
3 **Rule 26(f) scheduling** and in support of **my Notice of Lack of**  
4 **Subject-Matter Jurisdiction, Motion to Strike, and Motion for**  
5 **Sanctions.**  
6

7  
8 2. **Despite Defendant's willful disregard for proper removal**  
9 **procedure, the State Court continues to exercise jurisdiction,**  
10 **having issued a stay on January 7, 2025, pending a motion hearing**  
11 **on March 13, 2025.**  
12

13 3. Defendant **failed to effectuate removal under 28 U.S.C. § 1446(d)**  
14 **because:**  
15

- 16 ○ The **Notice of Removal was filed in federal court on**  
17 **December 6, 2024, but was not filed in state court until**  
18 **January 7, 2025, exceeding statutory limits.**  
19
- 20 ○ This renders removal **procedurally defective and void** under  
21 **Meyer v. Health Mgmt. Assocs., Inc., 841 F. Supp. 2d 1262,**  
22 **1265 (S.D. Fla. 2012).**  
23
- 24 ○ **Federal jurisdiction cannot be presumed where removal is**  
25 **procedurally defective (Gaus v. Miles, Inc., 980 F.2d 564, 566**  
26 **(9th Cir. 1992)).**  
27  
28

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**I. Rule 26(f) Compliance is Improper Without Jurisdiction**

4. **Despite jurisdiction being unresolved, Defendant insists on enforcing Rule 26(f) scheduling obligations**, improperly advancing federal proceedings in bad faith.
5. The **Supreme Court mandates that jurisdiction must be established before litigation proceeds** (Steel Co. v. Citizens for a Better Env't, 523 U.S. 83, 94 (1998)).
6. Plaintiff **explicitly objected to Rule 26(f) compliance**, citing jurisdictional defects and the **State Court's ongoing control over this matter** (See **Exhibit A**).
7. Plaintiff **did comply in good faith** with the **court's order and opposing counsel's deadline**, submitting Plaintiff's **Rule 26(f) statements on time**.
8. However, **opposing counsel deliberately omitted Plaintiff's statements from the version filed with the Court**, creating a misleading record designed to prejudice Plaintiff.

1                   **9. Advancing Rule 26(f) while jurisdiction remains unresolved is an**  
2                   **abuse of process warranting sanctions under FRCP Rule 11 (See**  
3                   **Chambers v. NASCO, Inc., 501 U.S. 32, 46 (1991)).**  
4

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8                   **II. Defendant's Procedural Gamesmanship & Snap Removal**  
9

10                   **10. Defendant's "snap removal" strategy was used to preemptively**  
11                   **block joinder of Raymond Pruitt, a properly joined forum**  
12                   **defendant under 28 U.S.C. § 1441(b)(2).**  
13

14                   **11. Pruitt's liability and connection to this case have been documented**  
15                   **since March 13, 2023,** including prior legal correspondence with his  
16                   counsel acknowledging his **role and responsibility.**  
17

18                   **12. The State Court accepted Plaintiff's Second Amended Complaint**  
19                   **(SAC) on December 10, 2024, formally joining Pruitt as a**  
20                   **defendant, thereby destroying diversity jurisdiction.**  
21

22                   **13. The forum defendant rule prohibits removal when a properly**  
23                   **joined and served defendant is a citizen of the forum state, as held**  
24                   **in Caterpillar Inc. v. Lewis, 519 U.S. 61, 68 (1996).**  
25

26                   **14. Courts have consistently rejected strategic removals designed to**  
27                   **evade proper joinder, recognizing such tactics as abusive and**  
28

1 **impermissible** (See *Gaus v. Miles, Inc.*, 980 F.2d 564, 566 (9th Cir.  
2 1992)).  
3  
4

---

5  
6 **III. Relief Requested**  
7

8 15. Plaintiff respectfully requests that the Court:  
9

- 10
- 11 • **Issue an immediate sua sponte dismissal under FRCP 12(h)(3) for**  
12 **lack of subject-matter jurisdiction.**
  - 13 • **Strike Defendant's Notice of Removal under FRCP 12(f) as**  
14 **procedurally defective.**
  - 15 • **Prohibit Defendant from unilaterally advancing Rule 26(f)**  
16 **scheduling or any further federal proceedings while jurisdiction**  
17 **remains unresolved.**
  - 18 • **Impose sanctions under FRCP Rule 11 and 28 U.S.C. § 1447(c) for**  
19 **bad faith litigation tactics.**
- 20  
21  
22  
23

24 16. Proceeding with **Rule 26(f) before resolving jurisdiction**  
25 **undermines judicial integrity and imposes unnecessary costs on**  
26 **all parties.**  
27  
28

1 I declare under **penalty of perjury** under the **laws of the United States and**  
2 **the State of California** that the foregoing is **true and correct** to the best of  
3 my knowledge and belief.  
4

5  
6  
7 **Executed on January 30, 2025, at Los Angeles, California.**  
8

9 Stephen Chapman

10 *Plaintiff, In Pro Per*  
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SUPPLEMENTARY DECLARATION OF PLAINTIFF STEPHEN CHAPMAN IN OPPOSITION TO RULE  
26(F) PROCEEDINGS & IN SUPPORT OF NOTICE OF LACK OF SUBJECT-MATTER JURISDICTION,  
MOTION TO STRIKE, AND MOTION FOR SANCTIONS

# EXHIBIT A

CORRESPONDENCES WITH OPPOSING COUNSEL



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**RE: Case No. 2:24-cv-10546 – Plaintiff's Statements**

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From Kristin A. Ingulsrud <kristin.ingulsrud@fmglaw.com>

Date Tue 1/28/2025 9:06 AM

To Stephen Chapman <stefinchapman@outlook.com>

You sent a new document that was incorrectly formatted and inexplicably changed and/or removed my client's positions on certain issues. As a practical matter, your new document was also sent only 21 minutes before close of business where my client is located. You were given two weeks to make changes. 21 minutes is unacceptable.

The document I formatted already allowed for your input as to each of the categories requested in the court's order. Since I did not receive your authorization to file, we proceeded to file on our client's behalf only.

I respectfully disagree on the source of the procedural challenges.

## Kristin A. Ingulsrud

Senior Counsel

### Freeman Mathis & Gary, LLP

550 South Hope Street | 22nd Floor | Los Angeles, CA 90071-2631

D: [213-615-7056](tel:213-615-7056) | C: [909-210-2763](tel:909-210-2763)

Email: [kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)

[www.fmglaw.com](http://www.fmglaw.com) | [Instagram](#) | [Twitter](#) | [Facebook](#)



Freeman  
Mathis & Gary LLP  
When It Counts



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**From:** Stephen Chapman <stefinchapman@outlook.com>  
**Sent:** Monday, January 27, 2025 3:46 PM  
**To:** Kristin A. Ingulsrud <kristin.ingulsrud@fmglaw.com>  
**Subject:** Re: Case No. 2:24-cv-10546 – Plaintiff's Statements

**Caution:** This email originated from outside of the FMG organization. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Hi Kristin,

Thank you for your email. I understand the urgency, and I want to clarify my position regarding the Joint Rule 26(f) Statement.

The version I sent adheres to the framework and structure outlined in the court's order and appropriately reflects the Plaintiff's positions. The changes were made to ensure the report complies with both procedural requirements and the factual complexities of the case.

As you know, the case has encountered significant procedural challenges, largely stemming from the premature removal to federal court under "snap removal" tactics. This has resulted in jurisdictional conflicts and confusion, as the State court proceedings remain stayed pending the motion to remand. These issues have necessitated additional time and resources to address.

While I respect your position, I believe it's essential for the Joint Statement to accurately reflect these complications and ensure both parties' positions are presented in good faith to the Court. If there are specific points in the Plaintiff's portion that require adjustment, I'm happy to review them collaboratively.

I remain committed to resolving this promptly and working towards an equitable resolution. Please let me know if you'd like to discuss this further before filing.

Best regards,

Stephen Chapman, B.Sc., AA

Medical Device Sales Manager, Los Angeles CA

C| +1 619-550-7543

E| [Stefinchapman@outlook.com](mailto:Stefinchapman@outlook.com)

*"I have no special talents, I am but only passionately curious."*

-Albert Einstein

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**From:** Kristin A. Ingulsrud <[kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)>  
**Sent:** Monday, January 27, 2025 1:52 PM  
**To:** Stephen Chapman <[stefinchapman@outlook.com](mailto:stefinchapman@outlook.com)>  
**Subject:** RE: Case No. 2:24-cv-10546 – Plaintiff's Statements

I've been attempting to get this done for weeks now. I don't know why you have created a new document that removes my client's positions and fails to comply with the Court's order. It is also already nearly 5 p.m. where my client is. We are not further revising Defendant's portions of the Joint Statement at this time.

Please sign the version I sent this morning by 2:30 p.m., otherwise we will proceed with our own separate statement and advise the court of your refusal to cooperate.

If it's not clear, you do not have our permission to file this document on our behalf.

**Kristin A. Ingulsrud**

Senior Counsel

**Freeman Mathis & Gary, LLP**

550 South Hope Street | 22nd Floor | Los Angeles, CA 90071-2631

D: [213-615-7056](tel:213-615-7056) | C: 909-210-2763

Email: [kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)

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**From:** Stephen Chapman <[stefinchapman@outlook.com](mailto:stefinchapman@outlook.com)>  
**Sent:** Monday, January 27, 2025 1:38 PM  
**To:** Kristin A. Ingulsrud <[kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)>  
**Subject:** Re: Case No. 2:24-cv-10546 – Plaintiff's Statements  
**Importance:** High

**Caution:** This email originated from outside of the FMG organization. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Kristin,

I hope you are doing well. As discussed, please find attached the Plaintiff's Statements for inclusion in our Rule 26(f) report for Case No. 2:24-cv-10546.

Should you have any questions or require additional information, please feel free to let me know.

Thank you for your cooperation and patience. The only preference I have that comes to mind is that all events be scheduled after March 20<sup>th</sup> 2025.

Please let me know if you have questions.

Thanks,

Stephen Chapman, B.Sc., AA

Medical Device Sales Manager, Los Angeles CA

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*"I have no special talents, I am but only passionately curious."*

-Albert Einstein

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**From:** Kristin A. Ingulsrud <[kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)>  
**Sent:** Monday, January 27, 2025 10:23 AM  
**To:** Stephen Chapman <[stefinchapman@outlook.com](mailto:stefinchapman@outlook.com)>  
**Subject:** RE: Case No. 2:24-cv-10546 – Plaintiff's Statements

Good Morning,

I'm not sure if you are referring to the Joint Statement, but if so, that is the document that I have been emailing about for the past couple weeks. Please let me know if I have authority to file the attached document. If you are a registered CM/ECF filer, I can file (with your permission) without your hand-signed signature. If you are not, please sign the "hand signature" version, scan and return.

Please let me know if you want us to file on your behalf by 2 p.m. so that we have time to get it filed today. If you do not intend to participate, please also let me know ASAP because then I need to redo this as a solo filing. Per the court's previous order, this is supposed to be a joint filing. The court has already reprimanded us once for not complying with this order.

**Kristin A. Ingulsrud**

Senior Counsel

**Freeman Mathis & Gary, LLP**

550 South Hope Street | 22nd Floor | Los Angeles, CA 90071-2631

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**From:** Stephen Chapman <[stefinchapman@outlook.com](mailto:stefinchapman@outlook.com)>  
**Sent:** Monday, January 27, 2025 8:30 AM  
**To:** Kristin A. Ingulsrud <[kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)>  
**Subject:** Case No. 2:24-cv-10546 – Plaintiff's Statements  
**Importance:** High

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Dear Kristin,

I hope this finds you well.

In an effort to produce a meaningful and mindful report, please be advised that we intend to produce the Plaintiff's Statements in compliance with Rule 26(f) before 1 p.m. (PST), as ordered by the Federal District Court for the Central District of California in Case Number 2:24-cv-10546.

Please feel free to reach out should you have any questions or concerns.

Sincerely,

Stephen Chapman, B.Sc., AA

Medical Device Sales Manager, Los Angeles CA

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E| [Stefinchapman@outlook.com](mailto:Stefinchapman@outlook.com)

*"I have no special talents, I am but only passionately curious."*

-Albert Einstein

---

**From:** Kristin A. Ingulsrud <[kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)>  
**Sent:** Thursday, January 16, 2025 10:54 AM  
**To:** Stephen Chapman <[stefinchapman@outlook.com](mailto:stefinchapman@outlook.com)>  
**Subject:** RE: Chapman v. Horace Mann - Joint Rule 26(f) Report

2:24-cv-10546-MWF-BFM #245 01.30.2025  
We disagree with your analysis regarding fraudulent joinder. Our position is that even if the case was remanded, Mr. Pruitt would likely be dismissed at the pleadings stage in state court, at which point the case would end up back in federal court after needless delay and expense to all parties.

More importantly at this time, we don't see it as affecting our duties under Rule 26.

**Kristin A. Ingulsrud**

Senior Counsel

**Freeman Mathis & Gary, LLP**

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**From:** Stephen Chapman <[stefinchapman@outlook.com](mailto:stefinchapman@outlook.com)>  
**Sent:** Thursday, January 16, 2025 9:47 AM  
**To:** Kristin A. Ingulsrud <[kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)>  
**Subject:** Re: Chapman v. Horace Mann - Joint Rule 26(f) Report

**Caution:** This email originated from outside of the FMG organization. **Do not click links** or **open attachments** unless you recognize the sender and know the content is safe.

Dear Kristin,

Thank you for your email regarding the Second Amended Complaint (SAC) and the inclusion of Defendant Raymond Pruitt. In response to your position as stated in your email. I would like take this opportunity to clarify why Pruitt's inclusion in this case is both valid and material to the claims, thereby impacting diversity jurisdiction as follows:

### 1. Independent Liability of Pruitt

Raymond Pruitt played a direct and independent role in the alleged acts giving rise to this dispute. His involvement includes, but is not limited to:

- **Policy Mismanagement:** Pruitt's oversight and administration of the policy directly contributed to the systemic billing errors and conflicting communications cited in the SAC.
- **False Assurances:** Pruitt provided misleading assurances regarding the terms and adjustments of the policy, causing material harm to the Plaintiff.
- **Decision-Making Authority:** As the agent of record, Pruitt's decisions and actions are central to the allegations of negligence, bad faith, and fraud.

Pruitt's liability is distinct from that of Horace Mann as a corporate entity, and his inclusion as a defendant is based on substantive claims directly tied to his conduct.

### 2. Local Jurisdiction

Pruitt's residency in California establishes him as a citizen of this forum state. Under the forum defendant rule codified in 28 U.S.C. § 1441(b)(2), removal is prohibited when any properly joined and served defendant is a citizen of the forum state.

- Horace Mann's incorporation status as a foreign corporation is irrelevant to this analysis, as Pruitt's inclusion prevents removal based on diversity jurisdiction.
- The SAC explicitly identifies Pruitt's California residency, further supporting Plaintiff's argument that diversity jurisdiction is destroyed.

The inclusion of Pruitt is not an attempt to defeat jurisdiction but is grounded in substantive and material claims directly related to his conduct.

- Plaintiff has articulated specific allegations against Pruitt, including his failure to manage the policy appropriately and his role in perpetuating billing errors and false representations.
- These claims are well-supported by evidence, including internal communications, billing notices, and correspondence involving Pruitt.
- Courts have consistently rejected claims of fraudulent joinder where substantive allegations exist against a non-diverse defendant.

In light of the above, Pruitt's inclusion in the SAC is proper and necessary for the adjudication of this matter.

I look forward to resolving these issues through the appropriate motions and ensuring clarity regarding the jurisdictional and substantive merits of the case.

Kindly,

Stephen Chapman

Plaintiff, In Pro Se

---

**From:** Kristin A. Ingulsrud <[kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)>

**Sent:** Thursday, January 16, 2025 8:07:22 AM

**To:** Stephen Chapman <[stefinchapman@outlook.com](mailto:stefinchapman@outlook.com)>

**Subject:** RE: Chapman v. Horace Mann - Joint Rule 26(f) Report

Our position is that neither a state or federal court will recognize the SAC because it was not properly filed. And even if eventually filed, naming an employee of a foreign corporation does not automatically destroy diversity jurisdiction. We intend to comply with the court's order.

**Kristin A. Ingulsrud**

Senior Counsel



Freeman Mathis & Gary, LLP

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**Sent:** Wednesday, January 15, 2025 8:46 PM  
**To:** Kristin A. Ingulsrud <[kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)>  
**Subject:** Re: Chapman v. Horace Mann - Joint Rule 26(f) Report

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Hi Kristin,

This is what is creating chaos in my mind as we continue to venture into the Federal Orders - there the attached lies in active wait.

From an unexperienced perspective, the logic in continuing to comply with Federal Orders in the sequence required it would seem that filing a motion to leave in recognize the SAC would decrease procedural confusion and a very likely chance of redundant actions.

To be frank, it seems as though we are playing house in an effort to sidestep the inevitable by ignoring the elephant in the room. What is the reason to do this ? Knowing diversity is destroyed once the court is made aware. Therefore, remanded back to the State?

I'm not saying this is your intention; but I am saying you have a job to do and I see that, respect that; to this end, respectfully, so do I.

Stephen Chapman, B.Sc., AA

Medical Device Sales Manager, Los Angeles CA

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E| [Stefinchapman@outlook.com](mailto:Stefinchapman@outlook.com)

*"I have no special talents, I am but only passionately curious."*

-Albert Einstein

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**From:** Kristin A. Ingulsrud <[kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)>

**Sent:** Wednesday, January 15, 2025 5:04 PM

**To:** Stephen Chapman <[stefinchapman@outlook.com](mailto:stefinchapman@outlook.com)>

**Subject:** RE: Chapman v. Horace Mann - Joint Rule 26(f) Report

For now we just need to file the Joint Rule 26(f) Report, which we seem close to finishing. Also optional for you to fill out the plaintiff's column on Exhibit A if you have a preferred timeline.

## Kristin A. Ingulsrud

Senior Counsel

Freeman Mathis & Gary, LLP

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**From:** Stephen Chapman <[stefinchapman@outlook.com](mailto:stefinchapman@outlook.com)>  
**Sent:** Wednesday, January 15, 2025 4:53 PM  
**To:** Kristin A. Ingulsrud <[kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)>  
**Subject:** Re: Chapman v. Horace Mann - Joint Rule 26(f) Report

**Caution:** This email originated from outside of the FMG organization. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Hi Kristin,

Thanks for the heads up and insights; I appreciate you.

I understand and thought this might be the case regarding the exhibits at this stage. Thanks!

I'd be more than happy to meet the court's orders asap. Anything in particular I should get started on?

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**From:** Kristin A. Ingulsrud <[kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)>  
**Sent:** Wednesday, January 15, 2025 3:40:56 PM  
**To:** Stephen Chapman <[stefinchapman@outlook.com](mailto:stefinchapman@outlook.com)>  
**Subject:** RE: Chapman v. Horace Mann - Joint Rule 26(f) Report

Thanks, I'll incorporate the changes and create separate sections for us on parts (g) and (m).

We don't agree that it would be appropriate to attach pleadings from the state court (if that's what you meant), as that goes beyond the purpose of this filing which is to facilitate a scheduling order. However, you can address any issues you think are responsive to the court's order within the report—we have more time to work on this if you want to add more. The court issued this order today:

**Docket Text:**

**SCHEDULING NOTICE and ORDER by Judge Michael W. Fitzgerald. On 12/12/2024, the Court issued an Order Setting Scheduling Conference [9] (the "Order"). Pursuant to that Order, the parties' Joint Rule 26(f) Report (the "Report") was due no later than 1/13/2025, and the Scheduling Conference was set on 1/27/2025 at 11:00 a.m. The required Report has not been filed. On its own motion, the Court VACATES the Scheduling Conference; no appearances shall be made. The parties are ORDERED to file the required Report, with a completed Schedule of Pretrial and Trial Dates Worksheet (Exhibit A to the Order), no later than 1/27/2025. The Court will review the Report and set pretrial and trial dates. Failure to timely file the Report may result in dismissal of this action without prejudice or the striking of Defendant's Answer. IT IS SO ORDERED. THERE IS NO PDF DOCUMENT ASSOCIATED WITH THIS ENTRY. (smom) TEXT ONLY ENTRY**

Service was mailed to you by the court, so you should receive this in a couple days.

## Kristin A. Ingulsrud

Senior Counsel

Freeman Mathis & Gary, LLP

550 South Hope Street | 22nd Floor | Los Angeles, CA 90071-2631

D: [213-615-7056](tel:213-615-7056) | C: 909-210-2763

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**From:** Stephen Chapman <[stefinchapman@outlook.com](mailto:stefinchapman@outlook.com)>  
**Sent:** Wednesday, January 15, 2025 2:25 PM  
**To:** Kristin A. Ingulsrud <[kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)>  
**Subject:** Re: Chapman v. Horace Mann - Joint Rule 26(f) Report

**Caution:** This email originated from outside of the FMG organization. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Hi Kristin,

Please see attached. I'd like to include the filed motion to strike, which includes the SAC and all exhibits concisely. as well as the state court filings ledger

if you prefer a call please feel free. thanks

Stephen Chapman, B.Sc., AA

Medical Device Sales Manager, Los Angeles CA

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E| [Stefinchapman@outlook.com](mailto:Stefinchapman@outlook.com)

*"I have no special talents, I am but only passionately curious."*

-Albert Einstein

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**From:** Kristin A. Ingulsrud <[kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)>  
**Sent:** Wednesday, January 15, 2025 9:39 AM  
**To:** Stephen Chapman <[stefinchapman@outlook.com](mailto:stefinchapman@outlook.com)>  
**Subject:** RE: Chapman v. Horace Mann - Joint Rule 26(f) Report

Hello,

Please find attached the updated joint statement—I also added a brief sentence in the beginning re the delayed filing. Please let me know if you have any further revisions. When the final draft is approved, please send me a photo or scan of the signature page with your signature and I will get it filed. Unless you are a registered CM/ECF filer, we have to file with your hand-signed signature.

I'll ask my client about stipulating to filing an amended complaint.

Thanks

**Kristin A. Ingulsrud**

Senior Counsel

**Freeman Mathis & Gary, LLP**

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**From:** Stephen Chapman <[stefinchapman@outlook.com](mailto:stefinchapman@outlook.com)>  
**Sent:** Tuesday, January 14, 2025 10:36 PM  
**To:** Kristin A. Ingulsrud <[kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)>  
**Subject:** Re: Chapman v. Horace Mann - Joint Rule 26(f) Report

**Caution:** This email originated from outside of the FMG organization. **Do not click links** or **open attachments** unless you recognize the sender and know the content is safe.

Hi Kristin,

Following our conversation I wanted to propose the attached document. Please review and feel free to connect with me tomorrow to discuss.

Thanks,



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*"I have no special talents, I am but only passionately curious."*

-Albert Einstein

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**From:** Kristin A. Ingulsrud <[kristin.ingulsrud@fmglaw.com](mailto:kristin.ingulsrud@fmglaw.com)>

**Sent:** Monday, January 13, 2025 7:50 PM

**To:** [stefinchapman@outlook.com](mailto:stefinchapman@outlook.com) <[stefinchapman@outlook.com](mailto:stefinchapman@outlook.com)>

**Subject:** Chapman v. Horace Mann - Joint Rule 26(f) Report



Hi Stephen,

Thanks for the call today. Attached is a draft Joint Report that I started—I don't have approval to file on my end yet but wanted you to be able to start reviewing. I pulled the format from the attached Order. Like I mentioned, we can subdivide any of the sections with "Plaintiff: xyz" and "Defendant: xyz" if we don't agree on any section.

We also have to fill out Exhibit A—I might just write out the dates and scan it since it doesn't look like the Court provided a version with text boxes.

**Kristin A. Ingulsrud**

Senior Counsel

**Freeman Mathis & Gary, LLP**

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